

# Developing a Local Air Toxics Inventory:

## Allegheny County's Approach

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# How to Do an Air Toxics Inventory

## Allegheny County's Approach

- Expand on Criteria Pollutant Inventory
- Write requirements into regulations
  - Allegheny County requires annual emission inventory of all regulated pollutants from
    - Title V Facilities
    - Synthetic Minor Facilities
    - Facilities with potential emissions of 25 or more tons per year of any regulated pollutant
  - Supporting and identifying information required
    - Amounts of all regulated air pollutants from each emissions unit
    - Detailed description of derivation
    - Detailed description of emission units including specific locations
    - Activity information as needed to determine emissions
  - Accountability
    - Certification signed by responsible official

# How to Do an Air Toxics Inventory

## Allegheny County's Approach

- Define parameters of air toxics inventory requirements
  - Allegheny County: 188 HAPs plus H<sub>2</sub>S and ammonia.
  - *De-minimus* levels for reporting
    - At least 0.1 TPY of a HAP for the entire facility
    - Exceptions for high risk pollutants (EPA guidance)
      - Chromium Compounds
      - Mercury Compounds
      - Polycyclic Organic Matter Compounds
      - Dioxin Compounds
      - Furan Compounds
  - Reporting recommendations/strategies for various pollutant groups adapted from U.S. EPA Guidance
    - Metals and Cyanide Groups
    - Polycyclic Organic Matter Compounds (POM)
    - Dioxins/Furans
    - Xylenes and Cresols
    - Glycol Ethers

# How to Do an Air Toxics Inventory

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- Establish firm schedule for reporting and fee collection
- Give clear, timely instructions to facilities
- Develop or purchase a comprehensive electronic reporting and database system
  - Headquarters database maintained by agency staff
  - Satellite program for facilities to submit inventories
  - Automated routine for inputting data submitted by facilities to the headquarters database
  - Automated routine for generating NEI input format files

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- Coordinate with other program functions
  - Permitting
    - Check Operating Permit applications against emission inventories
    - Installation permits – updated information
  - Enforcement/Inspections
    - Check against inventories
    - Information that may have been missed
  - Monitoring
    - Verify stack tests and CEM data
    - Emissions Inventory Section receives scanned test reports by e-mail
    - Ambient data may point to unidentified sources or reevaluation of known sources
  - Modeling and Program Planning
    - Feedback - What's needed and in what form

# HAP Reporting Percentages

- Title V Sources: 69 of 79 86%
- Major Sources: 50 of 51 98%
- Synthetic Minors: 19 of 28 68%
- Minor Sources: 45 of 77 58%

# SUMMARY

- Local air toxics emissions inventories are:
  - Essential – So locality is properly represented
  - Doable
- Essential elements are:
  - Regulatory basis for inventory
  - An understanding of the industrial presence in the regulated area
  - Electronic system for data collection, data management, and reporting
  - Support from and coordination with other functions within the agency
  - Well-defined parameters for the inventory collection effort, including limitations on
    - Who is to report
    - What pollutants are reported
    - De-minimus levels